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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 NEXTDOOR.COM, INC.,

16 Plaintiff,

17 vs.

18 RAJ ABHYANKER,

19 Defendant.

Case No. 3:12-cv-05667-EMC

**DECLARATION OF RAJ ABHYANKER
REGARDING CERTAIN DOCUMENTS IN
RESPONSE TO JUDGE COUSINS' JULY
1, 2014 ORDER (ECF NO. 250)**

Courtroom: A – 15th Floor
Discovery Judge: Hon. Nathanael Cousins

20 RAJ ABHYANKER,

21 Counterclaimant,

22 vs.

23 NEXTDOOR.COM, INC., et al.

24 Counterdefendants.

1 I, RAJ ABHYANKER, declare as follows:

2 1. I am the Defendant in this lawsuit. On July 1, 2014, Judge Cousins issued an
3 order requiring me to submit a declaration explaining my knowledge as to three categories of
4 documents and my efforts to locate these documents. ECF No. 250, at 3:24 – 4:4. The three
5 categories of documents are set out in ECF No. 232-1: (1) Item 3.b (“A copy of the ‘CD or flash
6 drive’ that Mr. Abhyanker claims he received from his assistant containing the Benchmark
7 Diligence CD”); (2) Item 3.d (“The original physical copies of the 2006 LegalForce entity
8 corporate records”); and (3) Item 3.e (“The original physical copy of the Sandeep Sood
9 confidentiality agreements.” ECF No. 232-1, at 2.

10 2. Each of the documents in question existed. Counsel and I made our best efforts to
11 search all relevant CDs, flash drives, and media we had in our possession at our 1580 W. El
12 Camino Real Mountain View office locations Suite 8, 10, 12, 13, and 14, 451 Shoreline Mountain
13 View building, and 323 University Palo Alto location. I searched the 4211 E. Wilshire Dr.
14 Phoenix location myself, but did not find anything there.

15 3. It is my belief that documents in question comprised whatever was produced.
16 They were each given to my counsel in this case. I have described below what my understanding
17 is what happened to them thereafter, but my understanding is limited given I do not have full
18 visibility into the actions of my counsel.

19 4. In accordance with Judge Cousins’ Order, each of these categories of documents is
20 addressed below.

21 **Item 3.b – A Copy of the CD or Flash Drive Containing the Benchmark Diligence CD**

22 5. My recollection of this document is as follows: My recollection is that legal
23 assistant Ravi Soni provided me a copy in late 2013 when he created multiple copies for counsel
24 in this case based on data of the Benchmark Diligence CD recovered by Central Computers. We
25 have determined that the copy was a CD and it has been given to my counsel for production.

26 **Item 3.d – The Original Physical Copies of the 2006 LegalForce Entity Corporate Records**

27 6. My recollection of this category of documents is as follows: Babar Rana had left
28 behind a folder of documents when he left his employment as the Director of Operations of Raj

1 Abhyanker LLP and Co-Founder, COO, and Interim CEO of LegalForce, Inc. in or around
2 January 2008. This folder was located at 1580 W. El Camino Suite 8 in the filing cabinets. My
3 counsel had possession of this folder in or around May 2013 and were instructed to preserve the
4 originals and make scans/copies of the originals. My counsel has been unable to locate the
5 physical files. Our efforts to locate the physical files include searching the Palo Alto and Mt.
6 View offices where my counsel worked and asking my counsel to locate the documents and
7 folder.

8 **Item 3.e – The Original Physical Copy of the Sandeep Sood Confidentiality Agreements**

9 7. My recollection of this copy of documents is that they were part of the folder
10 described in item 3.d above.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 Executed August 4, 2014 in California.

14
15 
16 _____
Raj Abhyanker